

CONTINUATION OF COMPLAINT

1. I, Karl G. Haws, am employed as a Special Agent of the Federal Bureau of Investigation, and have been so employed for over nine years. I am currently assigned to Detroit, Michigan, where my duties include the investigation of computer crimes and the use of computers to store, transmit, print and produce child pornography. I have also conducted investigations involving computer intrusions in the Eastern District of Michigan.
2. I bring this Continuation in support of an application for a criminal complaint against **PATRICK DALE WISEMAN** for distributing and possessing child pornography in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(a)(5)(B).
3. The statements contained in this Continuation are based upon my investigation and information provided by other law enforcement officers. I have set forth the facts that I believe are necessary to establish probable cause to believe that **PATRICK DALE WISEMAN** has committed violations of Title 18, United States Code, Sections 2252(a)(2) and 2252(a)(5)(B). Not all the information known to me has been included in this Continuation.

Details of the Investigation

4. On March 18, 2011, Special Agent (SA) James J. Wines, while acting in an undercover capacity in New Haven Connecticut, signed onto a publically available peer-to-peer file sharing program.
5. SA Wines connected with a user operating with the name "**wickedone911**." SA Wines browsed "**wickedone911's**" shared folder and observed file names indicative of child pornography. SA Wines downloaded one hundred and thirty three (133) files directly from "**wickedone911**" between approximately 3:36 p.m. and 3:47 p.m. Eastern Daylight Time (EDT). SA Wines identified the IP address utilized by "**wickedone911**," which was determined to be **67.162.214.63**. A MaxMind query of IP address **67.162.214.63** indicated that the Internet Service Provider (ISP) was Comcast Cable with a geolocation of Lansing, Michigan.
6. SA Wines downloaded 133 files and downloaded them exclusively from IP address **67.162.214.63**. Some of the downloaded images which contain Child Pornography depict the following:
 - a. An approximately 6-month-old female lying on back, with wrists and ankles bound, being vaginally penetrated by an object.
 - b. Several images depicting approximately 5 to 8 year old, nude, pre-

- pubescent females being orally, vaginally, and analy penetrated by an adult male penis.
- c. Several images showing approximately 8 to 9 year old pre-pubescent females holding an erect adult male penis in their hand.
 - d. Several images depicting approximately 7 to 9 year old females holding an erect adult male penis and showing a closeup of the girls' faces with what appears to be semen on their face.
 - e. Several images showing nude pre-pubescent females being posed for a picture with their legs apart revealing the genital area. Many of these pictures have multiple young females in the picture.
 - f. Several images showing an adult female orally penetrating an approximately 3 to 4 year old female.
7. Images are available for judicial review and are marked as "Exhibit 1" The exhibit will be returned to the U.S. Attorney's Office for safekeeping.
 8. On March 22, 2011, an administrative subpoena was served on Comcast Cable requesting subscriber information for IP address **67.162.214.63** on 03/18/2011 from 3:36 p.m. - 3:47 p.m. EDT. The subpoena results revealed that IP address **67.162.214.63** was assigned to the account of V. Wiseman, at 2379 HASLETT RD., EAST LANSING, MICHIGAN, at the time of the undercover session. **PATRICK WISEMAN** was identified as a resident of 2379 HASLETT RD., EAST LANSING, MICHIGAN.
 9. I was provided with information from the New Zealand Police. A New Zealand police officer, operating in a undercover capacity was communicating with "**Wickedone911**." In the course of the chat, "**Wickedone911**" claimed that he was currently sexually abusing his sister's three-year-old daughter. He claimed to have a fiancée from Asia and spent a lot of time in the Philippines where he engages in sexual activity with children. "**Wickedone911**" indicated he had a prior conviction for possession of child pornography.
 10. A criminal history check of the NCIC system and Michigan LEIN systems as well as the Michigan sex offender registry revealed that **PATRICK DALE WISEMAN** was convicted in 2002 in Florida on two counts of "Possess Photograph, Film, Or Other Representation That Knowingly, Includes Sexual, Conduct By Child." **PATRICK WISEMAN** has transferred his status to Michigan to live with family and is now a registered sex offender in the State of Michigan and is currently in compliance.
 11. On June 20, 2011, I spoke with Special Agent Timothy Kruithoff, Homeland Security Investigations - Immigration and Customs Enforcement. At my

request, Agent Kruithoff queried customs' databases and determined that **PATRICK WISEMAN** traveled to South East Asia a few times over the past three years and records indicated that he was married to a woman in Manila, Philippines.

12. On July 11, 2011, the Hon. Ellen S. Carmody, U.S. Magistrate Judge authorized a search of 2379 HASLETT RD., EAST LANSING, MICHIGAN (1:11-MJ-630, and incorporated herein). Copies of the images described in Paragraph 6, above, were provided to the Court has an exhibit.
13. The search warrant was executed on July 21, 2011. One of the items seized, a Toshiba laptop, serial number 59184145Q, was provided to investigators by PATRICK DALE WISEMAN. A forensic review of this laptop revealed the existence of 800 pictures and 133 videos containing suspected child sexually abusive material including bondage and bestiality. These images and videos were submitted to the National Center for Missing and Exploited Children (NCMEC) to determine if any of the child victims portrayed have been identified and ages confirmed. A Child Victim Identification Report from NCMEC confirmed that of the 800 images submitted for review, 314 of them are of known, identified victims from 66 different known series of pictures of child pornography. WISEMAN was asked if he was willing to be interviewed and he refused and invoked his right to counsel. He was not questioned any further and was not arrested.
14. On February 23, 2012, Special Agent (SA) Timothy Simon, while acting in an undercover capacity in Linthicum, Maryland, signed onto a publically available peer-to-peer file sharing program. SA Simon accepted a pending invitation from an individual utilizing the username "**Hothot911**" and then immediately observed that the user was online.
15. SA Simon made a direct connection to **Hothot911** and noted that the user initially had no shared folders on his account. SA Simon then initiated chat communications with **Hothot911**. The following is a sample of the chat conversations that took place between SA Simon and **Hothot911** on February 23, 2012:

SA Simon undercover account (23/02 14:07) > how u know me?

Hothot911 (23/02 14:09) > hello. i LOVE your topic and i feel like you. regular is not hard enough to get me off. i am newer here and lookin to make trusting contacts with simular interest

SA Simon undercover account (23/02 14:10) > u have files?

Hothot911 (23/02 14:11) > soe let me put them up. nothing as good as ur stuff. i have been searching 5 years for snuff never found any

Hothot911 (23/02 14:13) > awwww. ok. well then i have nothing yet, but please stay connected with me im on here all the time and if i find it, i will trade with u. i have a few pennetration pics of very young, but no video. it has gotten harder to find since last time i was on here looking

SA Simon undercover account (23/02 14:14) > u ben on (P2P) before?

Hothot911 (23/02 14:15) > i was like 1 year ago, then i had a clase scared so i ditched everything, i had some stuff extreme but not that hardcore as urs. but to protect my contacts i ditched my hole laptop and memory stick, that was 3 years woth of work errrrr

Hothot911 (23/02 14:16) > ur death vids sound out of this world

SA Simon undercover account (23/02 14:16) > what is ur fav age?

Hothot911 (23/02 14:16) > baby to 5

Hothot911 (23/02 14:17) > i have done persoally young but never baby, i want bad

SA Simon undercover account (23/02 14:17) > what u mean done persoally?

Hothot911 (23/02 14:18) > had sex with 6yo in cebu cithy philippines

SA Simon undercover account (23/02 14:18) > u from there?

SA Simon undercover account (23/02 14:18) > or travel lots

Hothot911 (23/02 14:18) > no but go there two times a year for sex trip

SA Simon undercover account (23/02 14:18) > oh ok

Hothot911 (23/02 14:21) > it is a great plae but i hear now cambodia is the hottest

Hothot911 (23/02 14:21) > and i hear u can get baby there

SA Simon undercover account (23/02 14:21) > how u make contact to go there

Hothot911 (23/02 14:23) > in philippines i normally go to areas where prostitutes are, look for the poorer dressed girls and dirty ones nd ask if they are moms. some will lie and say no because they know what the men want but some say yes.

Hothot911 (23/02 14:23) > also i know a few moms from online that i have seen a few times

SA Simon undercover account (23/02 14:24) > u meet there kids tooo?

Hothot911 (23/02 14:25) > yes im not interested in the mom, my cock only gets hard with hairless puss, crying, blood secreamng and pain

SA Simon undercover account (23/02 14:31) > i see, have thouht about travelling but never yet

Hothot911 (23/02 14:32) > it is great. if u ever go to cebu and wantto hurt a baby, let me know can put u in contact

SA Simon undercover account (23/02 14:33) > i would be intrested but afraid of police

Hothot911 (23/02 14:34) > there hell no. u meet up at night, u get on a boat, u get a mile off shore, they bring her to u, u do as u want they dump her u go back to shore

Hothot911 (23/02 14:54) > mmmmm death is the bet to see death from sex, m sooooo excited

16. **Hothot911** further indicated he was learning how to use his Apple computer to share folders and files, and eventually added one password-protected folder titled "new attempt". **Hothot911** provided the password as "asian" and stated they would upload more files later that day in order to trade the following day. SA Simon accessed this folder with the password provided and was able to preview six thumbnail images that appeared to contain a mixture of child erotica and child pornography involving pre-pubescent females. No files were downloaded by SA Simon during this session.
17. SA Simon's undercover account displayed two non-password-protected folders titled "Death" and "Pain and Torture", along with one password-protected folder titled "Madness." These folders contained a small number of corrupted video files with sexually explicit titles involving children. **Hothot911** made several comments about the "death vids" displayed on the account, including the statement, "mmmmm death is the bet to see death from sex, m sooooo excited". **Hothot911** also asked, "how old is the kid in the gangrape vid not teen is it." (Note: This was a reference to a corrupted video being shared by SA Simon titled "Accidental Child Death During Gang Rape.") **Hothot911** agreed not to

download any videos during this session, however another online meeting was planned for the following day.

18. On February 24, 2012, SA Simon again signed onto undercover account and observed that **Hothot911** was online. **Hothot911** immediately sent the chat message, "helllooo, i have been waiting for u, can we trade now".
19. SA Simon made a direct connection to **Hothot911** and accessed the "new attempt" folder using the previously provided password. The folder now contained 168 image files that could be previewed in thumbnail view. Nearly all files appeared to contain child pornography and depicted the lascivious exhibition, oral copulation, and vaginal/anal penetration of pre-pubescent females, some involving babies and others with bondage and bestiality. SA Simon proceeded to download all 168 files directly from **Hothot911**. Upon review, approximately 150 files appeared to contain child pornography. Some of the downloaded images which contain child pornography depict the following:
 - a. An adult male anally penetrating an approximately 3 to 4 year old child.
 - b. Multiple images depicting an adult male vaginally penetrating approximately 6 to 7 year old females.
 - c. Multiple images depicting approximately 4 to 6 year old females performing oral sex on an adult male.
 - d. An approximately 1 month old female with swollen genitals and what appears to be semen on her body and vaginal area.
 - e. Multiple images depicting approximately 6 to 8 year old females being tied up with rope or handcuffed and being held or held down by a nude adult male.
 - f. A close up of an approximately 4 year old female being partially penetrated by an adult male penis with the male's hand holding the penis partially inside the vagina and what appears to be semen covering the female's genitals.
 - g. Multiple images depicting approximately 6 to 7 year old females spreading their legs to show their genitals.
20. Images are available for judicial review and are marked as "Exhibit 2" The exhibit will be returned to the U.S. Attorney's Office for safekeeping.
21. **Hothot911** attempted to download the corrupted video file "Accidental Child Death During Gang Rape" from the undercover account, however the file (containing no child pornography) only partially downloaded prior to SA Simon logging off. During this session, SA Simon also continued the chat

communications with **Hothot911** and the following items were discussed by **Hothot911**:

Hothot911 (24/02 15:31) > can we trade now

SA Simon undercover account (24/02 15:31) > i figured, hangon a sec

Hothot911 (24/02 15:32) > even if what i have will only give me a vid or two, i want something sick and hard core

SA Simon undercover account (24/02 15:58) > u ever hurt a kid?

Hothot911 (24/02 16:00) > twice. only once did i go on boat. with the one contact if she knows ur going to hurt kid bad or do snuff, u have to go on boat, girl is put on boat in a bag no one sees here, after u are mile out, u do what u want, only u come back to shore

SA Simon undercover account (24/02 16:00) > what happens to girl

Hothot911 (24/02 16:02) > if dead, they make her bloody and drop in water for shark, if not, take to other island and resell her

SA Simon undercover account (24/02 16:06) > the contact u know, she help arrange this?

Hothot911 (24/02 16:07) > yes. she was used as a kid too, so she knows what is up. u meet with her, i normally take her to luch then to hotel for a fuck and i like to beat her. i tell her what i want. she brings girl, i pay her, she leaves. she will stay if u want her to help, however she does not like it.

Hothot911 (24/02 16:08) > i like to the point, this is not a game, it is mans pleasure up most important.

Hothot911 (24/02 16:11) > no ranges. if for just genital fuck, young is cheap as she gets older more money then after 14 15 16 price drops again. with baby, if genital u only get an inch, so they dont charge much. if u want to hurt or more, price goes up. i paid 125 for 6yo, beating, hanging, broken arm with sex and toilet play. i thought that was good deal

22. During the sessions on both dates, SA Simon used the program Wireshark in order to identify the IP address utilized by **Hothot911**, which was determined to be **68.61.150.253**. A query of the IP address **68.61.150.253** through a publicly available database indicated that the Internet Service Provider (ISP) was Comcast Cable in Lansing, Michigan.

23. On February 28, 2012 an administrative subpoena was served on Comcast Cable requesting subscriber information for IP address **68.61.150.253** used on 02/23/2012 and 02/24/2012 during the times matching the session times. The subpoena results revealed that IP address **68.61.150.253** was assigned to the account of V. Wiseman, 2379 HASLETT RD., EAST LANSING, MICHIGAN.

Conclusion

24. Based upon the above information, I believe that probable cause exists to believe that **PATRICK DALE WISEMAN** has committed violations of Title 18, United States Code, Sections 2252(a)(2) and Section 2252(a)(5)(B).
25. In consideration of the foregoing, I respectfully request that this court issue an arrest warrant for **PATRICK DALE WISEMAN**.